

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CHIQUITA FRESH NORTH AMERICA, LLC,
DOLE FRESH FRUIT COMPANY,
S. KATZMAN PRODUCE INC., and
KATZMAN BERRY CORP.,

Case No. 14-cv-00982-ADS-AKT

Plaintiffs,

-against-

LONG ISLAND BANANA CORP., SUFFOLK
BANANA CO. INC., and THOMAS J. HOEY,

Defendants.
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AFFIDAVIT OF JOHN REINA

John Reina, of full age, hereby certifies and declares under penalty of perjury as follows:

1. I am an individual and person of interest in connection with this case. I worked for Long Island Banana Corp ("LIB") and Suffolk Banana Co., Inc. ("Suffolk Banana") for over twenty eight (28) years. Most recently, my title was Senior Manager and ripener of bananas.

2. I submit this affidavit in support of a request by 28 William Street to appoint a Receiver over the assets of LIB, Suffolk Banana, Thomas Hoey, Jr., and all other companies controlled or owned by Hoey Jr, including HB Realty Corp., Brooke Enterprises and PF Transport. My concern is that if the principals continue to control the liquidation of assets, none of the creditors will be paid. There are many creditors who are owed substantial sums of money in these cases. The PACA Creditors are owed over \$1million dollars and I believe that other creditors are owed over \$2million dollars collectively.

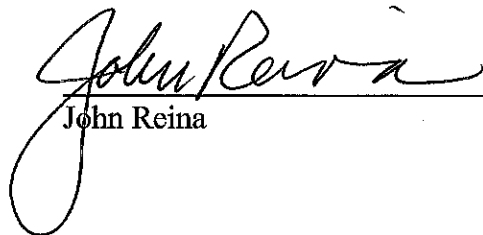
3. My claim arises from the defalcation or disposition of money that was being held by LIB, Suffolk Banana and Hoey, Jr. in the pension/profit sharing account(s). My understanding based upon conversations with the principals is that the money is gone. I have requested information from the principals about the money and whether it will be returned. They have ignored me. I wrote a letter to their counsel about the pension/profit sharing money. He has ignored my requests. I have also filed a claim with the Department of Labor.

4. If the principals continue to control the disposition of assets and liquidation of assets, I fear that the money will only be used for the personal expenses of the principals, including the criminal defense of Hoey, Jr., and the various attorneys he has retained for himself, the companies, his sister, his "friend", and others. In the end, however, I am owed in excess of \$200,000 from the pension/profit sharing account(s) which is apparently gone.

5. At the very least, I would request that this Court appoint someone over the assets so that they can be safeguarded and protected from further defalcation.

6. I declare under penalty of perjury that the foregoing is true and correct.

Dated: Westbury, New York
April 3, 2014


John Reina

Sworn to before me this
2nd day of April, 2014


Notary Public

JOSEPH S. MANISCALCO
Notary Public-State of New York
No. 02MA5063826
Qualified in Nassau County
My Commission Expires 7/29/14